

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
SEATTLE, WASHINGTON

KICHUL LEE; et al.,

Plaintiffs,

v.

ALBERTO R. GONZALES, Attorney  
General of the United States; et al.,

Defendants.

Case No. C04-449L

ORDER FOR NOTICE AND FAIRNESS  
HEARING PURSUANT TO RULE 23(E)

The parties have reached a settlement in this matter which the parties believe is fair, reasonable, and adequate. The court here orders a procedure in conformance with Rule 23(e) to consider the proposed settlement and any objections of class members, following notice to the class. At such time the court will make a determination whether the proposed settlement is fair, reasonable and adequate.

**Notice of Objections Procedure:**

Notice to class members will be as follows:

1. Defendants will post a copy of Notice to Class Members (Att. B hereto) in their offices in Seattle, Yakima and Spokane in a place visible to the public.
2. Defendants will mail the Notice to Class Members to Defendants' lists of

community agencies, and to their list of media in Washington State, and request that these entities distribute the notice.

3. Plaintiffs will distribute copies of the Notice to Class Members to the Washington State AILA list of members.

4. Defendants will post the Notice to Class Members on their webpage.

5. Plaintiffs' counsel will post the Notice to Class Members on their web-page.

6. Defendants will mail the Notice to Class Members to the potential class members identified by Defendant's CLAIMS 4 system, which includes all naturalization applicants from February 1, 1999 to the present, who have been denied naturalization for lack of good moral character, but excepts those who were statutorily denied and those who have subsequently reapplied and been naturalized.

7. Such notices shall be mailed or posted not later than December 5, 2005.

Posted notices shall remain posted until the date for submission of objections.

### **Objections to the Settlement:**

Class members may submit written objections to the settlement not later than January 9, 2006 to the court and counsel as listed on the Notice to Class Members.

### **Parties Response to Objections**

In the event any objections are made by class members, the parties will respond to objections not later than five business days after the close of the period for objections.

## Court Approval of Settlement

After the close of the objections and response periods above, the court will determine when a hearing should be scheduled and whether any objectors should be heard. The court will determine whether the proposed settlement is fair, reasonable and adequate.

Date: November 21, 2005.

Mr S Casnik

Robert S. Lasnik  
United States District Judge